



173082

RIVERFRONT PLAZA, EAST TOWER
951 EAST BYRD STREET
RICHMOND, VIRGINIA 23219-4074

TEL 804 • 788 • 8200
FAX 804 • 788 • 8218

DAVID O. LEDBETTER
DIRECT DIAL: 804-788-8364
EMAIL: dledbetter@hunton.com

FILE NO: 23390.000364

January 10, 2003

Via Overnight Delivery

Mr. William E. Munro, (S-6J)
Director
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: Sauget Groundwater UAO Settlement

Dear Mr. Munro:

Thank you for your letter of November 26, 2002, granting an extension to the period for submittal of certain parties' "intent to comply" responses to the referenced Unilateral Administrative Order. The current response date is January 15, 2003. On behalf of American Zinc Company (also known as or predecessor to American Zinc, Lead and Smelting Co., Gold Fields America Corp, Blue Tee Corp.), Browning Ferris Industries of North America (including Trashmen, C&E Hauling and Hilltop Hauling), Cargill Inc., Cerro Copper Products Company, Chemical Waste Management Inc. (including Onyx Environmental Services), Cyprus AMAX, Dennis Chemical Co., Inc., Ethyl Corporation and Ethyl Petroleum Additives, Inc. (formerly known as Edwin Cooper Corporation), ExxonMobil Corp. (formerly known as Mobil), The Glidden Co. (formerly known as U.S. Paint), Kerr-McGee (formerly known as T.J. Moss and Moss American), Norfolk Southern Corporation, Pillsbury Company, and Rogers Cartage (the "Settlement Parties"), this is to request that you grant an additional extension, to and including February 14, 2003.

The Settlement Parties participated in presenting a counter offer to Solutia in mid-December. Solutia has recently responded. The Settlement Parties believe their negotiations with Solutia have yielded meaningful progress and that they should continue. We hope that the EPA will facilitate those negotiations by granting this request.

Yours truly,

David O. Ledbetter

cc: Thomas Martin, Esquire ✓
Linda W. Tape, Esquire